

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SENTINEL INSURANCE COMPANY,  
LTD, A Connecticut corporation,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER,  
LLC, a Washington limited liability  
company; JAVAD A. SAJAN, M.D., a  
Washington individual; and STATE OF  
WASHINGTON,

Defendants.

CASE NO. 2:23-cv-01759-RAJ

**STIPULATED NOTICE OF  
DISMISSAL**

Pursuant to FRCP 41(a)(1)(A)(ii), Plaintiff Sentinel Insurance Company, LTD (“Sentinel”) and Defendants Alderwood Surgical Center, LLC (“Alderwood”), Javad A. Sajan, M.D. (“Dr. Sajan”), and the State of Washington (the “State”) hereby stipulate to this Notice of Dismissal, dismissing all claims against all Defendants, with no fees or costs owing to any Party with respect to this lawsuit. There are no cross-claims and no pending motions.

///

///

///

Accordingly, this matter can be closed on the Court's registry.

**IT IS SO STIPULATED:**

<p>DATED this 5<sup>th</sup> Day of September, 2024.</p>	<p><b>GORDON &amp; POLSCER, L.L.C.</b></p> <p>By: <u>s/ Brian C. Hickman</u>            Brian C. Hickman, WSBA No. 50089            9020 SW Washington Square Rd., Suite 560            Tigard, OR 97223</p> <p>Telephone: (503) 242-2922</p> <p>Email: <u>bhickman@gordon-polscer.com</u></p> <p><i>Counsel for Plaintiff</i>  <i>SENTINEL INSURANCE COMPANY, LTD.</i></p>
<p>DATED this 5<sup>th</sup> Day of September, 2024.</p> <p>///</p> <p>///</p> <p>///</p>	<p><b>GORDON &amp; POLSCER, L.L.C.</b></p> <p>By: <u>s/ Austin Smith</u>            Austin Smith, WSBA No. 59487            1700 Seventh Ave., Suite 2100            Seattle, WA 98101</p> <p>Telephone: (206) 223-4226</p> <p>Email: <u>asmith@gordon-polscer.com</u></p> <p><i>Counsel for Plaintiff</i>  <i>SENTINEL INSURANCE COMPANY, LTD.</i></p>

DATED this 5<sup>th</sup> Day of September, 2024.

**MILLER NASH LLP**

By: s/ Tristan Swanson  
Tristan Swanson, WSBA No. 41934

By: s/ Carolyn A. Mount  
Carolyn A. Mount, WSBA No. 55527

605 5th Avenue S, Suite 900  
Seattle, WA 98104

Telephone: (206) 624-8300

Email: [tristan.swanson@millernash.com](mailto:tristan.swanson@millernash.com)  
Email: [carolyn.mount@millernash.com](mailto:carolyn.mount@millernash.com)

*Counsel for Defendants*  
*ALDERWOOD SURGICAL CENTER, LLC AND*  
*JAVAD A. SAJAN, M.D.*

DATED this 5<sup>th</sup> Day of September, 2024.

**ROBERT W. FERGUSON**

Attorney General

By: s/ Laura K. Clinton  
Laura K. Clinton, WSBA #29846  
Senior Assistant Attorney General

800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Telephone: (206) 464-7744

Email: [laura.clinton@atg.wa.gov](mailto:laura.clinton@atg.wa.gov)

*Counsel for Defendant*  
*STATE OF WASHINGTON*